

Pro Se 4 (Rev. 12/16) Complaint for a Civil Case Alleging Breach of Contract

UNITED STATES FEDERAL COURT

for the

District of Puerto Rico

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2024 OCT 16 AM 9:04

Case No. 24-1480 (JAG)
(to be filled in by the Clerk's Office)

Plaintiff(s)
Logan Martin Lee
651 Avenida Ponce de Leon
San Juan, Puerto Rico 00907

-v-

Jury Trial: (check one) Yes No
☒

RECEIPT # 114912
AMOUNT: \$405.00
OCT 16 2024
CASHIER'S SIGNATURE

Defendant(s) CML
Daniel Everett Baker
6226 Devinney Circle
Arvada, CO 80004

COMPLAINT FOR A CIVIL CASE ALLEGING BREACH OF CONTRACT
(28 U.S.C. § 1332; Diversity of Citizenship)

I. The Parties to This Complaint
A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Logan Martin Lee
Street Address	651 Avenida Ponce de Leon
City and County	San Juan
State and Zip Code	Puerto Rico, 00907

Telephone Number 843-469-5045
E-mail Address logan@oficinasanturce.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title *(if known)*. Attach additional pages if needed.

Defendant No. 1

Name Daniel Everett Baker
Job or Title *(if known)* Unemployed
Street Address 6226 Devinney Circle
City and County Arvada
State and Zip Code Colorado, 80004
Telephone Number 787-223-2558
E-mail Address *(if known)* danielebaker@gmail.com

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

II. Basis for Jurisdiction

Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. This is a diversity of citizenship case with damages in excess of \$75,000.00

A. The Plaintiff(s)

- If the plaintiff is an individual
The plaintiff, *(name)* Logan Lee, is a citizen of the
State of *(name)* Puerto Rico
- If the plaintiff is a corporation
The plaintiff, *(name)*, is incorporated
under the laws of the State of *(name)*,
and has its principal place of business in the State of *(name)*

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

B. The Defendant(s)

- If the defendant is an individual
The defendant, Daniel Baker, is a citizen of
(name)
the State of *(name)* Colorado. Or is a citizen of
(foreign nation)

2. If the defendant is a corporation

(name) The defendant, , is incorporated under

(name) the laws of the State of , and has its

(name) principal place of business in the State of .

Or is incorporated under the laws of (foreign nation) ,

and has its principal place of business in (name) .

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

C. The Amount in Controversy

The breach of contract is in reference to a residential real estate property in Rincon, Puerto Rico worth in excess of \$1,000,000.00

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

The plaintiff, (name) Logan Martin lee , and the defendant,

(name) Daniel Baker , made an agreement or contract on

(date) July 15, 2020 . The agreement or contract was (oral or written) oral. . Under that agreement or contract, the parties were required to

We agreed to invest in a short term vacation rental property in Rincon, Puerto Rico at 1 Calle Colina Lina. The agreement split the equity and short term rental profits 50 percent each. Additionally, we agreed to divide the downpayment and the expenses to upgrade the property 50 percent each.

Attached the court will find evidence supporting this claim such as text messages of Baker offering to purchase my shares in the property, Personal Financial Statement prepared by Baker's CPA, which was used to apply for mortgages clearing declaring a 50% partnership in the property, Baker writtenletter to Banco Popular to open the business bank account, Renovation budget tracker, Wire confirmation for downpayment, Wire confirmation for 50% of mortgage while the renovation was in process, and Airbnb review causing business reputational damage.

The defendant failed to comply because

Four years later, on September 5, 2024 at 1:01 PM, Baker sent an email notice that he had changed the locks of the Rincon property and that he would no longer permit short term rentals. This action with zero notice set in motion serious consequences for immediately arriving guests, our business team maintaining the property, and our business reputation. The plaintiff has complied with the plaintiff's obligations under the contract.

IV. Relief

The action to block access to the property denies my right of 50% ownership and the 50% value of any potential sale of the property. An estimated value of the 50% of equity is \$600,000.00 to \$750,000.00. In addition, the action to block access to the property cancels more than \$50,000 of revenue from our short term vacation rental business.

We ask the court to declare Lee's claim to 50% equity in 1 Calle Colina Lina is valid.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

10/15/24

Signature of Plaintiff

Printed Name of Plaintiff

Logan Lee

B. For Attorneys

Date of signing:

Signature of Attorney

Printed Name of Attorney

Bar Number

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Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address